

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

21 MC 103

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SUSANA MIRANDA AND MARTIN LABRE,

08CV02293

Plaintiffs,

- against -

ON-SITE:

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING, INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.; BECHTEL ASSOCIATES PROFESSIONAL CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEL & COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C; C.B. CONTRACTING CORP; CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH ; DIAMOND POINT EXCAVATING CORP ; DIEGO CONSTRUCTION, INC.; DIVERSIFIED CARTING, INC.; DMT ENTERPRISE, INC. D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING CONTRACTORS INC; EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING OF CORONA(EROC); EWELL W. FINLEY, P.C; EXECUTIVE MEDICAL SERVICES, P.C; FLEET TRUCKING, INC; FRANCIS A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC; GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC; HALLEN WELDING SERVICE, INC; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA CONSTRUCTION INC; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS P.C; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC; PT & L CONTRACTING

CORP.; ROBER SILMAN ASSOCIATES; ROBERT L GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPertz & HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIVAIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC.; TORRETTA TRUCKING, INC; TOTAL SAFETY CONSULTING, L.L.C; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC; WSP CANTOR SEINUK; YANNUZZI & SONS, INC; YONKERS CONTRACTING COMPANY, INC; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC,

OFF-SITE:

100 CHURCH, LLC, 150 BROADWAY CORP., 150 BROADWAY N.Y. ASSOCS. L. P., 225 BROADWAY COMPANY LP, 50 TRINITY, LLC, 59 MAIDEN LANE ASSOCIATES, LLC, 88 GREENWICH LLC, AJ GOLDSTEIN & CO., ALAN KASMAN DBA KASCO, ALAN L. MERRIL, AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION, AT&T WIRELESS SERVICES, INC., BAILEY N.Y. ASSOCIATES, BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BETTY JEAN GRANQUIST, BFP ONE LIBERTY PLAZA CO., LLC,, BLACK DIAMONDS LLC, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC D/B/A BMS CAT, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BRAUN MANAGEMENT INC, BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP, BROOKFIELD FINANCIAL PROPERTIES, INC, BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC, BT PRIVATE CLIENTS CORP., CAROL GAYNOR TRUST, CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST, CAROL MERRIL GAYNOR, CUNNINGHAM DUCT CLEANING CO., INC, DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC, FGP 90 WEST STREET INC, FRED GOLDSTEIN, GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC, GRUBB & ELLIS MANAGEMENT SERVICES, HARLAND GAYNOR, AS TRUSTEE UNDER A DECLARATION OF TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A DECLARATION OF TRUST, HERMAN L. BLUM, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT

OF LOUIS W. GOLDSTEIN, HIGHLAND DEVELOPMENT LLC, HILLMAN ENVIRONMENTAL GROUP, LLC, HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, INDOOR ENVIRONMENTAL TECHNOLOGY, INC, KASCO RESTORATION SERVICES CO., KIBEL COMPANIES, LAW ENGINEERING P.C, MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC, MOODY'S HOLDINGS, INC, NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC, NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC, NOMURA SECURITIES INTERNATIONAL, INC, ONE LIBERTY PLAZA, ONE WALL STREET HOLDINGS, LLC, PAMELA BETH KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, R Y MANAGEMENT CO, INC, ROWAN K. KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC, RUTH G. LEBOW, RY MANAGEMENT, SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER DECLARATION OF TRUST, STEEPLECHASE ACQUISITIONS LLC, STRUCTURE TONE (UK), INC, STRUCTURE TONE GLOBAL SERVICES, INC, SYLVIA R. GOLDSTEIN, THE BANK OF NEW YORK COMPANY, INC, THE BANK OF NEW YORK TRUST COMPANY NA, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TOSCORP INC, TRC ENGINEERS, INC, TUCKER ANTHONY, INC, TULLY CONSTRUCTION CO, INC, TULLY INDUSTRIES, INC, VERIZON NEW YORK, INC, WESTON SOLUTIONS, INC, WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., WORLD FINANCIAL PROPERTIES, L.P., AND ZAR REALTY MANAGEMENT CORP., ET AL

Defendants.

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**ENVIROTECH CLEAN AIR'S ANSWER TO CHECK OFF COMPLAINTS  
 RELATED TO THE MASTER COMPLAINTS**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaints filed in the 21 MC 100 and 21 MC 102 actions, hereby adopts Envirotech's Answer to the Master Complaint

dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
June 6, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
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BY:   
Heather L. Smar (4622)